

1 William E. Peterson (NV Bar 1528)
2 Wayne Klomp, Esq. (NV Bar 10109)
3 C. Thomas Burton, Jr., Esq. (NV Bar 3030)
SNELL & WILMER L.L.P.
50 West Liberty Street, Suite 510
Reno, Nevada 89501-1961
Telephone: 775-785-5440
Facsimile: 775-785-5441
Email: wpeterson@swlaw.com
wkloomp@swlaw.com
tburton@swlaw.com
Attorneys for Plaintiff ShieldIO, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

11 SHIELDIO, INC.,

12 Plaintiff,

13 vs.

14 SIMON I. BAIN, an individual,

15 Defendant.

Case No. 3:19-cv-700-MMD-WGC

**STIPULATION AND ORDER
EXTENDING TIME FOR PLAINTIFF
TO RESPOND TO SIMON I. BAIN'S
MOTION TO DISMISS COMPLAINT
(FIRST REQUEST)**

17 Plaintiff ShieldIO, Inc. ("ShieldIO") and Defendant Simon I. Bain ("Bain"), through their
18 counsel, hereby respectfully request the Court enter an order, pursuant to Local Rules IA 6-1 and
19 7-1 extending the time for ShieldIO to respond to Bain's motion to dismiss complaint (ECF No.
20 7) otherwise due December 27, 2019. The Parties request that the time be extended to January 27,
21 2020.

22 The Parties are currently involved in settlement discussions. Therefore, the stipulation and
23 extension are made by the Parties in good faith for the benefit of each. The stipulation is made for
24 the benefit of the Parties and the Court and not for any deleterious purposes nor to delay these
25 proceedings.

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1 Dated: December 19, 2019
2 BROWNSTEIN HYATT FARBER
3 SCHRECK, LLP

4 By: /s/ Matthew D. Francis
5 Matthew D. Francis (NV Bar 6978)
6 Arthur A. Zorio (NV Bar 6547)
7 5371 Kietzke Lane
8 Reno, NV 89511

9 KNOWMAD LAW
10 Christopher R. McElwain (CA Bar 289132)
11 *Pro hac vice to be submitted*
12 484 Washington St., B-313
13 Monterey, CA 93940

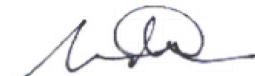
14 *Attorneys for Defendant Simon Bain*

Dated: December 19, 2019
SNELL & WILMER L.L.P.

By: /s/ Wayne Klomp
William E. Peterson (NV Bar 1528)
C. Thomas Burton, Jr. (NV Bar 3030)
Wayne Klomp, Esq. (NV Bar 10109)
50 West Liberty Street, Suite 510
Reno, Nevada 89501-1961

Attorneys for Plaintiff ShieldIO, Inc.

16 **IT IS SO ORDERED.**



17 UNITED STATES DISTRICT JUDGE

18 DATED: December 23, 2019

27 STIPULATION AND ORDER EXTENDING TIME FOR PLAINTIFF TO RESPOND TO
28 SIMON I. BAIN'S MOTION TO DISMISS COMPLAINT